

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

William Anderson

Case No.

23-mj-17045

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2023 in the county of Burlington in the  
District of New Jersey, the defendant(s) violated:

*Code Section**Offense Description*

18 USC 2252A(a)(2)(A) and (b)(1)

Distribution of Child Pornography

See Attachment A

This criminal complaint is based on these facts:

See Attachment B

☒ Continued on the attached sheet.*Complainant's signature*

SA Shannon Treney, FBI

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephoneDate: 09/26/2023*Judge's signature*City and state: Camden, New Jersey

Hon. Sharon A. King USMJ

*Printed name and title*

**CONTENTS APPROVED**

**UNITED STATES ATTORNEY**

*Joseph McFarlane*

By: \_\_\_\_\_  
JOSEPH MCFARLANE  
Assistant U.S. Attorney

Date: September 25, 2023

**ATTACHMENT A**

**Distribution of Child Pornography**

On or about January 26, 2023, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

**WILLIAM ANDERSON,**

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce, and that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

**ATTACHMENT B**

**AFFIDAVIT**

I, Shannon Treney, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I am a Special Agent with the FBI, and have been since May 2017. My experience as a Special Agent has included, among other things, the investigation of cases involving human trafficking, sex trafficking, and violent crimes. Prior to that, from approximately 2011 to 2017, I was a Staff Operations Specialist with the FBI, focused on assisting with cases involving street gangs and crimes against children. I have received training and have gained experience in the use of physical and electronic surveillance, interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, and various other criminal laws and procedures.

2. This Affidavit is being made in support of an arrest warrant for WILLIAM ANDERSON, for distribution of child pornography or visual depictions of minors engaging in sexually explicit conduct, in violation of Title 18 United States Code § 2252A.

3. The statements in this Affidavit are based upon on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that WILLIAM ANDERSON committed violations of 18 U.S.C. § 2252A(a).

4. Kik Messenger (“Kik”) is an instant mobile messaging application that allows users to transmit and receive messages, photos, videos, sketches, mobile web pages, and other content after users register a username. Kik allows users to join and participate in groups with multiple users and also allows individuals to message one-on-one with other users.

5. On January 26, 2023, an FBI Online Covert Employee (“OCE”) was operating on Kik to identify users seeking to sexually exploit children. The OCE was in a Kik group chat called “Abduct & Force.” While in the group, a user with the Kik username will13guy and the display name of “Mr. Anderson” posted an image of an anime child wearing see-through lingerie. As detailed below, the individual with the Kik username will13guy was identified during this investigation as ANDERSON.

6. The OCE then directly messaged with ANDERSON. The OCE told ANDERSON that the OCE had a purported 11-year-old stepdaughter, and ANDERSON expressed a sexual interest in the purported minor.

7. ANDERSON and the OCE discussed trading pictures, and the OCE stated “if u had shit u made too I’d trade for it but if not I’m not giving my shit for [] nothing.”

8. ANDERSON then sent the OCE a video of a female child, approximately 12 to 14-years old, fully nude, rubbing her vagina. ANDERSON stated it was his 12-year-old “cusion.”

9. ANDERSON then sent a video file of an erect penis penetrating an anus. He wrote “idk who was tighter her or her sister.” He also stated that the sister was “younger.”

10. ANDERSON also sent a video file of a female child, approximately 10 to 12-years-old, inserting her own fingers inside her vagina. ANDERSON wrote that it was “my friends daughter he don’t know tho.”

11. ANDERSON then provided the OCE with advice for how the OCE could have sexual intercourse with the OCE's purported minor stepdaughter.

12. In a separate conversation in the Abduct & Force group chat, which is an open chat group that was visible to the OCE, ANDERSON and another individual discussed abducting the individual's "ex," who is from Pennsylvania, so that ANDERSON could have sex with her. ANDERSON wrote that the individual should bring her to "genes motel in Cinnaminson nj."

13. In response to an administrative subpoena, on June 23, 2023, Kik provided the following information regarding the username will13guy:

- i. First Name: Mr.
- ii. Last Name: Anderson
- iii. Email (unconfirmed): william.anderson72@gmail.com
- iv. Device Model: iPhone and/or iPad
- v. IP address: 73.198.120.139
- vi. The most recent use of the account was on June 22, 2023.

14. In response to an administrative subpoena, Charter Communications provided the following information about IP address 73.198.120.139:

- i. Subscriber name: Leglency Anderson
- ii. Service/Billing Address: unit block of Goodwin Lane, Willingboro, NJ.

15. Open-source databases show that an individual named William T. Anderson lives on the unit block of Goodwin Lane, Willingboro, NJ.

16. Records obtained from the Willingboro Police Department and the New Jersey Motor Vehicle Commission also show that an individual named William T. Anderson lives on the unit block of Goodwin Lane, Willingboro, NJ.

17. On July 6, 2023, the Honorable Ann Marie Donio authorized a search warrant for the Kik account with the username will13guy (the "Subject Account"), Mag. No. 23-mj-2050.

18. According to the search warrant returns, the Kik account was last accessed on July 5, 2023, from the same IP address that connects to the unit block Goodwin Lane, Willingboro, NJ.

19. The search warrant returns for the Subject Account contained the following videos with the following details:

a. Video 1:

- i. Filename: aa3aa499-8f32-4688-bec8-dcaaeef4079c.mp4
- ii. 25 second long; sent by the Subject Account.
- iii. This is the video sent by ANDERSON to the OCE on January 26, 2023, as described *supra* paragraph 8.

b. Video 2:

- i. Filename: b36d044d-40a6-4491-9bb4-4fe949e0aed7.mp4
- ii. 10 second long; sent by the Subject Account.
- iii. This is the video sent by ANDERSON to the OCE on January 26, 2023, as described *supra* paragraph 10.

c. Video 3:

- i. Filename: 33b127fb-1997-4bda-9802-e0cda1b79ae8
- ii. 14 seconds long; sent by the Subject Account.

iii. The video appears to depict a prepubescent black female, possibly between the ages of 4-6 years old, fully nude except for a gold necklace and earrings. She is laying on a surface covered by a black and white striped cloth. Her hair appears to be in multiple braids fastened by pink and white hair clips. A toothbrush is manipulated by someone off-screen to rub her vagina. The minor female's arms are visible and supporting her torso as it is raised off the bed, and she does not touch the toothbrush.

d. Video 4:

- i. Filename: 0b5891a1-504f-4a33-9815-f482ea5b9a56
- ii. 44 seconds long; received by the Subject Account.
- iii. This video appears to depict a prepubescent Caucasian female, approximately 7-9 years old, laying on her back on what appears to be a couch. There are grey cushions and multiple multi-colored/patterned sheets or blankets underneath her. She appears to have brown hair and is fully nude. A Caucasian male is penetrating her vagina with his penis. The male is only visible from the waist to the knees. The male continues to have vaginal intercourse with the minor female for the duration of the video.

e. Video 5:

- i. Filename: 0dcc1fb9-99d3-44f3-9313-8973dc2ad004
- ii. 37 seconds long; received by the Subject Account.
- iii. This video appears to depict a prepubescent black female, approximately 7-9 years old. She is wearing pink glasses, and her black hair is braided in multiple braids fastened with white hair clips. She is fully nude and



appears to be sitting on a grey leather seat. A pink and a blue cloth-like item are visible on the seat on either side of the female. She places her mouth on the penis of an adult black male and moves her mouth up and down on his penis. The male is clothed in a black shirt with a pattern and blue jeans. His penis is exposed through the zipper in his jeans. He lifts up his shirt to expose his penis. The female looks towards the camera and smiles, and then returns to moving her mouth up and down on the male's penis.

f. Video 6:

- i. Filename: 30f1f84e-d9cb-4ae1-93f6-b74a4f6fc701
- ii. 29 seconds long; received by the Subject Account.
- iii. This video appears to depict a nude prepubescent Caucasian female with brown hair, approximately 7-9 years old, laying on her back on top of a pink sheet. A Caucasian male is standing over her head with his legs spread, inserting his penis into her mouth. A greenish wall is visible between his legs. He moves his penis up and down into her mouth. She places her hands on the inside of his thighs. The camera pans down to show the female's vagina. The male reaches down and spreads the female's legs, exposing her vagina to the camera.

g. Video 7:

- i. Filename: 178ffbfa-e3a1-495f-ae5a-f8b2b815cce4
- ii. 25 seconds long; received by the Subject Account.
- iii. This video appears to depict a pubescent Caucasian female who is fully nude, with light brown or dark blonde hair. She has some breast development but lacks pubic hair. She appears approximately 11-13 years old. She appears to be

lying on her back with her head raised in a room with white walls. A blue curtain is partially visible behind her left side and what appears to be lights are visible behind her right side. She inserts one or more fingers into her vagina and masturbates her vagina with her fingers throughout the video.

20. On August 16, 2023, the Honorable Sharon A. King authorized search warrants for ANDERSON's residence on the unit block of Goodwin Lane, Willingboro, NJ, No. 23-mj-17033, and ANDERSON's person, No. 23-mj-17034.

21. On August 21, 2023, law enforcement officers executed the search warrants for ANDERSON's residence and person.

22. ANDERSON was interviewed by law enforcement officers that same day and admitted that the Subject Account was one of his Kik accounts, although he claims he was locked out of it sometime in early 2023.

23. Law enforcement officers showed ANDERSON screenshots from the videos found in the Subject Account, and ANDERSON admitted to receiving, possessing, and viewing all seven videos identified above in paragraph 19.

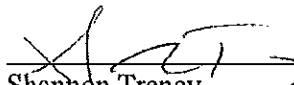
24. ANDERSON agreed to take a polygraph test and was provided *Miranda* warnings prior to the examination. In response to questions posed during the polygraph examination, ANDERSON admitted that he obtained sexual gratification from child pornography and admitted to distributing child pornography.

25. During the search of ANDERSON's residence, law enforcement officers located an iPad model 11, with serial number H98G4N1QQ1GG, in the room ANDERSON shared with his brother. ANDERSON stated that the iPad belonged to him and law enforcement officers

subsequently searched it. ANDERSON consensually provided his password to access his Kik accounts and his personally-owned electronic devices.

26. ANDERSON's iPad had the Kik application installed, and the Subject Account was logged in to Kik. The two videos that ANDERSON had distributed to the OCE, identified in paragraphs 8 and 10 *supra*, were saved to the iPad.

27. During the search of ANDERSON's residence, law enforcement officers found a Google Android phone, model OnePlus Nord N20 5G, with IMEI number 866966053086596. ANDERSON admitted that the phone was his. A search of the phone showed that ANDERSON had logged into Kik using a Kik account other than the Subject Account. ANDERSON admitted that the Kik account belonged to him. A subsequent search of the phone showed that ANDERSON sent the video identified *supra* in paragraph 10, to another Kik user on or about June 3, 2023.

  
Shannen Treney  
Special Agent, FBI

Pursuant to Fed. R. Crim. P. 4.1, Special Agent Treney was sworn and attested to the contents of this affidavit in support of the complaint and arrest warrant for Defendant William Anderson.

  
HON. SHARON A. KING  
United States Magistrate Judge

Date: September 26, 2023